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8 *Attorneys for Mark D. Waldron, Chapter 11 Trustee*

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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington  
corporation,

Debtor.

Case No. 18-03197 FPC 11

Chapter 11

**MOTION TO ADMIT ATTORNEY  
WILLIAM R. FIRTH, III *PRO HAC*  
*VICE* UNDER LOCAL CIVIL RULE  
83.2(c)(3)**

**[No Hearing Requested]**

Attorney Paul H. Beattie of CKR Law LLP respectfully moves this  
honorable Court under Eastern District of Washington LBR 9010-1 and Eastern  
District L. Civ. R. 83.2(c) for an Order granting the *Pro Hac Vice* admission of  
William R. Firth, III (“Applicant”), who is Mr. Beattie’s partner at CKR Law  
LLP.

**BACKGROUND**

The Chapter 11 Trustee, Mark D. Waldron, has retained CKR Law LLP as  
general bankruptcy counsel. Applicant Firth is a member in good standing of the  
State Bars of Delaware, New Jersey and Pennsylvania. As set forth below,

1 Applicant's law partner, Paul H. Beattie, is a member of the Washington State Bar  
2 and is admitted to practice before the United States District Court for the Eastern  
3 District of Washington (where he has practiced for many years) and before this  
4 honorable Court.

5 **LOCAL CIVIL RULE 83.2(c)(4) COMPLIANCE**

6 Movant and Applicant submit the following information as required by  
7 Eastern District L. Civ. R. 83.2(c)(4). The information is confirmed and attested  
8 to in the accompanying Declaration of William R. Firth, III, Attorney.

9 **A. Applicant's Address and Telephone Number.**

10 William R. Firth, III, Attorney  
11 CKR Law LLP  
1000 N. West Street, Suite 1200  
12 Wilmington, Delaware 19801  
T: (302) 367-7903  
13 E: [wfirth@ckrlaw.com](mailto:wfirth@ckrlaw.com)

14 **B. Dates of Admission to Practice Before Other Courts.**

15 2002: Admitted to New Jersey Bar  
Admitted to Pennsylvania Bar  
16 U.S. District Court for the District of New Jersey  
17 U.S. District Court for the Eastern District of Pennsylvania

18 2003: Admitted to Delaware Bar  
U.S. District Court for the District of Delaware  
19 U.S. Third Circuit Court of Appeals  
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1           **C. Name, Address and Telephone Number of Admitted Counsel**  
2           **With Whom the Applicant Will Be Associated.**

3           Paul H. Beattie, WSBA No. 30277  
4           CKR Law LLP  
5           506 2<sup>nd</sup> Avenue, 14<sup>th</sup> Floor  
6           Seattle Washington 98104  
7           T: (206) 696-9095  
8           E: [pbeattie@ckrlaw.com](mailto:pbeattie@ckrlaw.com)

9           **D. Necessity for Appearance by Applicant**

10          Mr. Firth is an experienced bankruptcy litigator. He has direct experience  
11          investigating and prosecuting civil fraud in the bankruptcy context in general and  
12          involving Russian defendants, specifically. Mr. Firth's expertise is critical in this  
13          case because of the indicia of fraud that are present.

14          As set forth in the Firth Declaration, Applicant, a graduate of Villanova  
15          University, the University of Pennsylvania and Villanova Law School, is an  
16          experienced Chapter 11 bankruptcy practitioner who has eighteen years of  
17          experience in bankruptcy litigation and insolvency matters– all directly relevant to  
18          this case. Importantly, CKR Law LLP has one of the largest and most  
19          experienced blockchain practice groups in the United States: their knowledge and  
20          experience, tapped into and deployed by Mr. Firth, will allow the Chapter 11  
21          Trustee to properly discharge his responsibilities in this factually and legally  
22          complex Chapter 11 proceeding.

23           **E. Disciplinary Sanctions by Any Court or Bar Association.**

24          Applicant has never been disciplined or sanctioned by any court or bar  
25          association.

1 **CONCLUSION**

2 WHEREFORE, the duly-appointed Chapter 11 Trustee, through Attorney  
3 Paul Beattie, respectfully requests that the Court enter an Order:

- 4 1. Granting the Application in its entirety;  
5 2. Allowing Applicant Firth to participate in this case on a *pro hac vice*  
6 basis; and  
7 3. Granting any further relief the Court deems to be appropriate and  
8 just.

9 Dated: March 22, 2019

CKR LAW LLP

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11 By: /s/ Paul H. Beattie  
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16 *Trustee*